

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

OMEGA PATENTS, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 21-30-CFC
)	
BAYERISCHE MOTOREN WERKE AG, a)	
Foreign company, and BMW OF NORTH)	
AMERICA, LLC,)	
Defendants.)	
)	
)	

**PLAINTIFF’S APPLICATION FOR ISSUANCE OF LETTER ROGATORY FOR
INTERNATIONAL JUDICIAL ASSISTANCE TO THE APPROPRIATE JUDICIAL
AUTHORITY TO EFFECT SERVICE OF PROCESS**

Plaintiff Omega Patents, LLC (“Plaintiff”) respectfully requests that the Court issue the Request for International Judicial Assistance (Letter Rogatory), attached hereto, pursuant to Federal Rule of Civil Procedure 4(f)(2)(B), in order to effect service of process on Defendant Bayerische Motoren Werke AG, a German company.

Plaintiff understands that Germany is a signatory to the Hague Convention on the Service Abroad of Judicial and Extra-Judicial Documents in Civil or Commercial Matters (the “Hague Convention”). Plaintiff further understands that, if a judgment is to be enforced, Germany is not likely to recognize service by any other means and may require that service be effected pursuant to letters rogatory. Accordingly, Plaintiff requests that this Court issue the accompanying Letter Rogatory and that the executed Letter Rogatory be returned to counsel for Plaintiff for delivery to the proper international authorities. Upon receipt of the executed Letter Rogatory, counsel for Plaintiff will deliver the Letter Rogatory and certified translations to the proper international authorities.

Dated: January 27, 2021

BAYARD, P.A.

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